

Appendix 7

Letters sent to EPA to meet the milestones and reporting requirements of the Early Action Compacts





2600 Bull Street
Columbia, SC 29201-1708

COMMISSIONER:
C. Earl Hunter

December 20, 2002

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Mr. J. I. Palmer, Jr., Regional Administrator
USEPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

Dear Mr. Palmer:

The South Carolina Department of Health and Environmental Control (DHEC) is moving forward with the development of an early action State Implementation Plan (SIP), as offered by the Environmental Protection Agency (EPA), allowing cleaner air sooner for South Carolina. On November 25, 2002, DHEC completed negotiations with EPA Region 4 staff regarding South Carolina's 8-Hour Ozone Early Action Compacts (EAC).

The EACs were developed to include the local county government, DHEC and the EPA as signatory parties. It should be noted however, that interested stakeholders (i.e., local, state, and federal government, citizens, public interest groups, and the business community) have been and will continue to be involved in the planning process. Enclosed are copies of letters of support received to date from interested stakeholders.

Although we have identified the local county government to be a responsible party for participation in the EAC, the counties participating may or may not be part of future boundary determinations and discussions. Specifically, EPA should not consider the counties participating in the EAC as the presumptive boundaries for any future non-attainment designations.

The Early Action Compact states that the initial modeling emissions inventory and the base case modeling will be completed by December 31, 2002. The completion of these items is addressed in the attached *8-Hour Ozone Modeling Analysis and Attainment Demonstration for South Carolina's Early Action Compact Technical Protocol*.

Letter to Mr. Palmer
December 20, 2002
Page 2

South Carolina maintains responsibility and authority for implementing environmental programs throughout the state, including those in The Catawba Indian Nation, located in York, Lancaster and Chester counties. The Catawba Indian Nation will be included in all planning aspects of the early action SIP through direct communication and their representation on the local Metropolitan Planning Organization. Additionally, DHEC plans to continue to support the efforts of the Central Carolinas Integrated Air Quality Management Pilot Project.

Enclosed are South Carolina's 8-Hour Ozone Early Action Compacts signed by me, representing DHEC and the respective county official representing counties in the areas identified on the attached map. The participating counties to date include the following and are listed by Council of Government (COG) planning areas:

Appalachian: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg

Catawba: Chester, Lancaster, Union, York

Pee Dee: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro

Waccamaw: Williamsburg

Santee Lynches: Clarendon, Lee, Sumter

Berkeley-Charleston-Dorchester: Dorchester

Low Country: Beaufort, Colleton, Hampton, Jasper

Lower Savannah: Aiken, Barnwell, Calhoun, Orangeburg

Central Midlands: Lexington, Newberry, Richland

Upper Savannah: Abbeville, Edgefield, Laurens, Saluda

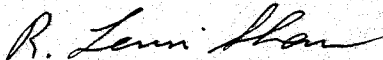
Should additional EAC's be received after submittal of this correspondence, they will be forwarded to EPA under separate cover.

Having the EAC completed and signed by all parties, including EPA will complete the first "key" milestone as outlined in the November 14, 2002, guidance memorandum issued by Mr. Jeffrey R. Holmstead. We are asking that EPA sign the enclosed EACs no later than December 31, 2002, and return the original for our files. We will then forward a copy to the respective counties.

Letter to Mr. Palmer
December 20, 2002
Page 3

We appreciate the opportunity to participate in the early action SIP process. Thank you for the assistance and support EPA has provided thus far in this process, especially during the public meetings held in October and in the development of the EAC. We look forward to continuing to work with EPA as we implement measures to achieve cleaner air sooner for South Carolina and our neighboring states. Should you have questions or desire additional information, please do not hesitate to contact me at (803) 896-8940 or Jim Joy, Chief of DHEC's Bureau of Air Quality at (803) 898-4123.

Sincerely,



R. Lewis Shaw, P.E.
Deputy Commissioner
Environmental Quality Control

Attachments: 1. Early Action Compacts
2. Area Map of South Carolina
3. Letters of Support
4. *8-Hour Ozone Modeling Analysis and Attainment Demonstration for South Carolina's Early Action Compact Technical Protocol*

cc: Kay Prince, EPA Region 4
Beverly Bannister, EPA Region 4 (no attachments)
County Officials (no attachments)
Gilbert B. Blue, Chief, Catawba Indian Nation (no attachments)
Harold Reheis, GA Dept. of Natural Resources (no attachments)
Ron Methier, GA Dept. of Natural Resources (no attachments)
William Ross, NC Dept. of Environmental and Natural Resources (no attachments)
Keith Overcash, NC Dept. of Environmental and Natural Resources (no attachments)
EQC District Directors (no attachments)



2600 Bull Street
Columbia, SC 29201-1708

COMMISSIONER:
C. Earl Hunter

June 13, 2003

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Lawrence R. Chewning, Jr., DMD

Mr. J. I. Palmer, Jr., Regional Administrator
USEPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

Dear Mr. Palmer:

As a requirement for continued participation in South Carolina's 8-Hour Ozone Early Action Compact, enclosed you will find the June 2003 milestone reports. These two reports, the June 16 List of Emission Reduction Strategies Under Consideration and the June 2003 Progress Report have been completed by participating counties and the South Carolina Department of Health and Environmental Control (DHEC). Enclosure 1 includes the reports and associated attachments for DHEC. Enclosure 2 includes the June 2003 milestone reports for each participating county, grouped by the following areas:

Appalachian: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg
Catawba: Chester, Lancaster, Union, York
Pee Dee: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro
Waccamaw: Georgetown, Horry, Williamsburg
Santee Lynches: Clarendon, Kershaw, Lee, Sumter
Berkeley-Charleston-Dorchester: Berkeley, Charleston, Dorchester
Low Country: Beaufort, Colleton, Hampton, Jasper
Lower Savannah: Aiken, Allendale, Bamberg, Barnwell, Calhoun, Orangeburg
Central Midlands: Fairfield, Lexington, Newberry, Richland
Upper Savannah: Abbeville, Edgefield, Greenwood, Laurens, Saluda

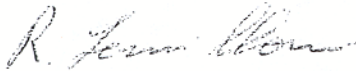
At the request of EPA, once we have electronic copies of the progress report and the list of strategies, these two reports will be forwarded to your office via electronic mail.

Although we have identified the local county government to be a responsible party for participation in the EAC, the counties participating may or may not be part of future boundary determinations and discussions. Specifically, EPA should not consider the counties participating in the EAC as the presumptive boundaries for any future non-attainment designations.

Letter to Mr. Palmer
June 13, 2003
Page 2

Thank you for the assistance and support EPA has provided in this process. We look forward to continuing to work with EPA as we implement measures to achieve cleaner air sooner for South Carolina and our neighboring states. Should you have questions or desire additional information, please do not hesitate to contact Jim Joy, Chief of DHEC's Bureau of Air Quality at (803) 898-4123 or Henry Phillips of his staff at (803) 898-3260.

Sincerely,



R. Lewis Shaw, P.E.
Deputy Commissioner
Environmental Quality Control

Enclosures: 1. South Carolina DHEC June 2003 Milestone Reports
2. June 2003 Milestone Reports for Participating Local Areas

cc: Kay Prince, EPA Region 4
County Officials (no attachments)
Ron Methier, GA Dept. of Natural Resources (no attachments)
Keith Overcash, NC Dept. of Environmental and Natural Resources (no attachments)
EQC District Directors (no attachments)



2600 Bull Street
Columbia, SC 29201-1708

December 19, 2003

Mr. J. I. Palmer, Jr., Regional Administrator
USEPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

Dear Mr. Palmer:

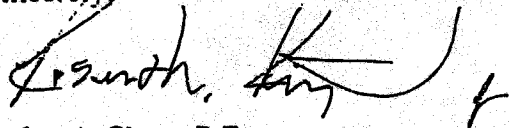
As a requirement for continued participation in South Carolina's 8-Hour Ozone Early Action Compact, enclosed you will find the December 2003 Progress Report completed by participating counties and the South Carolina Department of Health and Environmental Control (DHEC). Enclosure 1 includes the report for DHEC and Enclosure 2 includes the report for each participating county, grouped by the following areas:

Appalachian: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg
Catawba: Chester, Lancaster, Union, York
Pee Dee: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro
Waccamaw: Georgetown, Horry, Williamsburg
Santee Lynches: Clarendon, Kershaw, Lee, Sumter
Berkeley-Charleston-Dorchester: Berkeley, Charleston, Dorchester
Low Country: Beaufort, Colleton, Hampton, Jasper
Lower Savannah: Aiken, Allendale, Bamberg, Barnwell, Calhoun, Orangeburg
Central Midlands: Fairfield, Lexington, Newberry, Richland
Upper Savannah: Abbeville, Edgefield, Greenwood, Laurens, Saluda

The modeling and emissions inventory components of the early action process remain on schedule. Meetings continue to be held with local stakeholder groups to assist in determining the emission reduction strategies that will be included in the final local Early Action Plans due to EPA in March 2004. DHEC has requested assistance from EPA, Region 4 in determining emission reductions from proposed strategies.

Thank you for the assistance and support EPA has provided in this process. We look forward to continuing to work with EPA as we implement measures to achieve cleaner air sooner for South Carolina and our neighboring states. Should you have questions or desire additional information, please do not hesitate to contact Jim Joy, Chief of DHEC's Bureau of Air Quality at (803) 898-4123 or Henry Phillips of his staff at (803) 898-3260.

Sincerely,



R. Lewis Shaw, P.E.
Deputy Commissioner
Environmental Quality Control

Enclosures: 1. South Carolina DHEC December 2003 Progress Report
2. December 2003 Progress Reports for Participating Local Areas

cc: Kay Prince, EPA Region 4
County Officials (no attachments*)
Ron Methier, GA Dept. of Natural Resources (no attachments*)
Keith Overcash, NC Dept. of Environmental and Natural Resources (no attachments*)
EQC District Directors (no attachments*)

*All those not receiving attachments will be notified when materials are placed on website.

BOARD:
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Coleman F. Buckhouse, MD

March 31, 2004

Mr. J. I. Palmer, Jr., Regional Administrator
U.S. EPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

Dear Mr. Palmer:

The Early Action Compact requires local areas to submit Early Action Plans to the United States Environmental Protection Agency (EPA) by March 31, 2004. To fulfill that required milestone, this package contains the local area plans as well as information regarding statewide activities that contribute to bringing cleaner air to the citizens of South Carolina.

Both the 2007 future year modeling emissions inventory and the attainment maintenance analysis have been completed. Information regarding these two Early Action Compact (EAC) milestones, as well as information regarding the modeled control cases is contained in the *DRAFT 8-hour Ozone Modeling Analysis and Attainment Demonstration for South Carolina's Early Action Compact, Technical Support Document*, March 2004. This document will be finalized and submitted to EPA as a part of the Early Action SIP, December 2004. A copy of the *Technical Support Document, Executive Summary* can be found in Enclosure 1. The *Technical Support Document* and associated files can be found on the enclosed disk. South Carolina has invested significant resources to conduct a statewide 8-hour ozone modeling analysis. Modeling results demonstrate that all areas of South Carolina will attain the 8-hour ozone standard by 2007. In fact, modeling results indicate a 12 percent statewide average decrease in ozone levels. In addition, a modeling analysis for 2012 demonstrates continued attainment. The results of this modeling validate the regional modeling done by EPA, which also demonstrated attainment for all South Carolina areas. Work is currently underway on a modeling run using estimated 2017 emissions. This work is being done to review attainment issues beyond the mandated 2012 time frame.

South Carolina has also implemented a comprehensive ozone-forecasting program that covers twenty-nine of the state's forty-six counties, including those most vulnerable to higher ozone levels. Citizens in those counties are advised on a daily basis about predicted air quality so that they can take actions to protect their health. In addition, South Carolina is an original partner with EPA on the AIRNow project, which allows the current and forecast ozone and particulate matter air quality information to be available to citizens statewide.

The South Carolina General Assembly passed, and Governor Sanford signed, a joint resolution endorsing Early Action Compacts and encouraging state agencies to lead by example and develop programs that focus on reduction in ground-level ozone. At the end of 2002, 45 of South Carolina's 46 counties had entered into Early Action Compacts to implement ozone reduction strategies earlier than federally required. These counties, along with other government entities, industry, environmental groups, and other stakeholders have worked together both at the local level and state level to develop strategies to reduce ozone pollution. These efforts affirm our commitment to improve air quality for all of South Carolina. In fact, the stakeholders involved in this early action process identified 675 initiatives to obtain ozone reductions at a local level. To ensure that future growth does not adversely affect South Carolina's ability to meet the 8-hour ozone standard, the state is on schedule to impose regulations to address NO_x.

emissions from new and existing stationary sources and open burning activities statewide. These requirements will have the potential of reducing and preventing the addition of over 5,500 tons of NO_x to the state's current emissions inventory.

The South Carolina Department of Health and Environmental Control (Department) has also been working with the largest existing industrial sources in the more vulnerable areas of South Carolina to reduce NO_x emissions. These efforts will result in a reduction of 12,458 tons per year in NO_x emissions from 8 facilities, and these reductions will be captured through permit limits. Detailed information regarding the specific facilities and the respective reductions will be included in South Carolina's Early Action SIP submittal, December 2004.

Department air officials have been proactive in planning for improved air quality in the state and in the region. In 2001, it became apparent that there was a significant interest by the utility industry in the I-85 corridor of South Carolina due to the location of the natural gas pipeline and access to the electrical power grid. The Department began to receive numerous power plant permit applications. As this was a vulnerable area with regards to ground-level ozone, the numbers of permit applications and the potential impact of these sources on the area's ability to meet the 8-hour ozone standard became an utmost concern. The Department determined that authorizing the large amounts of additional NO_x emissions that were proposed by these and other similar large NO_x sources would not be appropriate without a showing that these additional emissions would not adversely impact this area. As a result of this determination, NO_x emissions estimated at 3610 tons per year have not been authorized.

In addition to the milestones for identifying and adopting early control measures established in the EAC, one condition set by EPA Region 4 for York, Chester, and Lancaster counties participation, requires that South Carolina continue to actively participate in the Charlotte Region Integrated Air Quality Management Pilot Project. This project has since been renamed "Sustainable Environment for Quality of Life" (SEQL) and the Department is an active partner in this project. Further, the Department has entered into a Memorandum of Understanding with the North Carolina Department of Environment and Natural Resources to improve air quality in the Charlotte region.

To ensure air quality goals are considered in all transportation plans, programs and projects, the Department is working closely with Federal Highways, EPA Region 4, South Carolina Department of Transportation and local Metropolitan Planning Organizations. While this effort, referred to as "Smart Highways," is not a strategy that will result in emission reductions, it will provide the citizens of South Carolina the assurance that air quality goals are considered in transportation improvements.

The Department anticipates having plans in place by April 2005 for statewide compliance with 8-hour ozone standards, well before EPA's deadline of April 2007 with attainment for some marginal and moderate areas in 2007 and 2009, and until 2024 for areas with the worst air quality.

Enclosed you will also find the local Early Action Plans completed by participating counties and a progress report update of emission reduction strategies for the Department. This information will be available on our website as soon as possible. Enclosure 2 includes the updated progress report for the Department and Enclosure 3 includes the final local Early Action Plan for each participating county, grouped by the following areas:

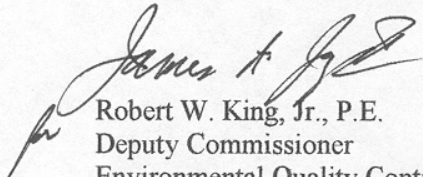
Letter to Mr. Palmer
March 31, 2004
Page 3

Appalachian: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg
Catawba: Chester, Lancaster, Union, York
Pee Dee: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro
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Upper Savannah: Abbeville, Edgefield, Greenwood, Laurens, Saluda

Local stakeholder groups continue to meet and upon request, the Department attends as many of these meetings as possible to offer technical assistance and updates regarding the 8-hour ozone standard and the early action process.

To date, the early action process has been a positive experience for South Carolina. The awareness of air quality issues has reached an all-time high and is expected to increase as the local areas implement education and outreach initiatives. Thank you for the assistance and support EPA has provided in this process. We look forward to continuing to work with EPA as we implement measures to achieve cleaner air sooner for our citizens. Should you have questions or desire additional information, please do not hesitate to contact me at (803) 896-8940 or Henry Phillips, of my staff at (803) 898-3260.

Sincerely,



Robert W. King, Jr., P.E.
Deputy Commissioner
Environmental Quality Control

Enclosures: 1. *DRAFT 8-hour Ozone Modeling Analysis and Attainment
Demonstration for South Carolina's Early Action Compact, Technical Support
Document, March 2004*
 2. South Carolina's March 2004 Progress Report Update
 3. Local Early Action Plans for Participating Areas

cc: Kay Prince, EPA Region 4
 County Officials (no attachments*)
 Ron Methier, GA Dept. of Natural Resources (no attachments*)
 Keith Overcash, NC Dept. of Environmental and Natural Resources (no attachments*)
 EQC District Directors (no attachments*)
 Henry Phillips (no attachments*)

*All those not receiving attachments will be notified when materials are placed on website.

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Coleman F. Buckhouse, MD

June 29, 2004

Mr. J. I. Palmer, Jr., Regional Administrator
U.S. EPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

RE: June 2004 Early Action Progress Report

Dear Mr. Palmer:

South Carolina Early Action Compacts identify "key" milestones that are required for the continued deferral of the effective date of nonattainment designations and also milestones that track the progress being made by the state and local areas toward adoption and implementation of emission reduction measures. This correspondence identifies the progress made by South Carolina and participating areas since the March 2004 submittal. Enclosure 1 includes the June 2004 Progress Report for each participating county, grouped by the following areas:

Appalachian: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg
Catawba: Chester, Lancaster, Union, York
Pee Dee: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro
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In addition to the progress indicated by each county on the enclosed reports, the South Carolina Department of Health and Environmental Control (Department) is involved with the counties in a number of other projects that benefit air quality. A few of these projects include:

- Mass Transit - The South Carolina Department of Transportation (DOT) in partnership with Santee Wateree and Central Midlands Regional Transit Authority (CMRTA) are resuming "SMARTRIDE." As a result of the positive data collected during the research project in October 2003, DOT determined that there is significant support for a commuter service into Columbia from neighboring towns and cities. Commuters from and around Kershaw, Newberry, and Richland counties will benefit from this project.
- Mass Transit - The CMRTA recently replaced the entire bus fleet for the Columbia and surrounding area with the purchase of 43 new transit buses. Seven of these buses are fueled by compressed natural gas (CNG). The remaining buses utilize clean diesel technology. The reduced emissions from these buses will benefit both Richland and Lexington counties.
- Mass Transit - To encourage mass transit, discounted tickets are being offered to Department staff. This is just one example of how the Department can lead by example to promote emission reduction strategies.

- Landscaping - Through a grant from the Urban Forestry Commission, trees will be planted in front of the main South Carolina Department of Health and Environmental Control building in Columbia. This demonstration project will show how trees help both the quality of air and water.
- Gas Can Exchange Event – Over the last several months, the Department has assisted Richland, Lexington and Greenwood counties with a Gas Can Exchange Event. This event encourages individuals and business to bring an old gas can to exchange for a free, new, environmentally friendly gas can.
- Advanced Travel Center (Truckstop) Electrification (ATE) – The South Carolina Department of Health and Environmental Control, North Carolina Division of Air Quality, and Georgia Environmental Facilities partnered with IdleAire Technologies Corporation and the South Carolina State Energy Office to install 150 ATE truck parking spaces at three truckstops along the I-85 corridor in North Carolina, South Carolina, and Georgia in order to reduce the need for truck idling. The long-term goal of this project is to show that ATE technology can have a positive impact on fuel conservation and can improve local air quality. The site location for South Carolina is in Anderson County.

The Department also continues to be an active partner in the *Sustainable Environment for Quality of Life* (SEQL) project. Meetings held over the last several months include discussions regarding Regional Vulnerability Assessment Program (ReVA), desired results from the program as it relates to air quality issues and to coordinate efforts with other regional efforts. There has also been a meeting to discuss integrated planning and how SEQL can assist local governments.

As stated in the March 2004 submittal, both the 2007 future year modeling emissions inventory and the attainment maintenance analysis have been completed. Information regarding these two Early Action Compact (EAC) milestones, as well as information regarding the modeled control cases is contained in the *DRAFT 8-hour Ozone Modeling Analysis and Attainment Demonstration for South Carolina's Early Action Compact, Technical Support Document*, submitted March 31, 2004. Since Federal controls indicate attainment for the EAC areas in South Carolina in 2007, 2012, and 2017, no additional modeling runs are planned. On June 10, 2004, the Department received draft comments from EPA, Region 4, on the March 2004 submittal and will be addressing these comments in the December 31, 2004, Early Action State Implementation Plan (SIP) submittal due December 31, 2004.

On May 1, 2004, DHEC made the 8-hour Ozone forecast available to the public. This service will continue through September 30, 2004. The forecast is for four areas within South Carolina. These areas include the Upstate, Central Midlands, Central Savannah River and Pee Dee. The Catawba area, including Chester, Lancaster and York counties is included in North Carolina's forecast through a cooperative partnership. A link for the Catawba forecast is included on the Department's website.

Local stakeholder groups continue to meet and upon request the Department attends as many of these meetings as possible to offer technical assistance and updates regarding the 8-hour ozone standard and the early action process.

Upon publication in the June 25th issue of the *State Register*, the EAC regulations will become effective. Regulation 61-62.5, Standard 5.2, Control of Oxides of Nitrogen is a newly developed regulation that targets new stationary sources of NO_x emissions and requires controls equivalent to Best Available Control Technology (BACT). The sources affected by this regulation (≥ 10 mmBTU/hr heat input) are generally those smaller sources that are exempt from BACT because they fall below the emission thresholds. The regulation also requires existing sources that replace their burners to replace them with a low NO_x burner.

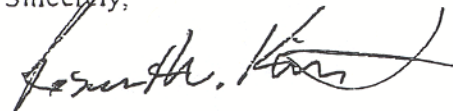
Regulation 61-62.2, Prohibition of Open Burning was revised to prohibit construction waste from being burned. However, the Department allowed an exemption from the ban for single or two family residential construction waste provided that it is burned outside of the ozone season. In addition, the Open Burning regulation was revised to prohibit the burning of household trash. Under the old regulation, household trash could be burned if other disposal services did not exist.

The Department continues to work with the largest existing industrial sources in the more vulnerable areas of South Carolina to reduce NO_x emissions. As stated in the March 2004 submittal, these efforts will result in a reduction of 12,458 tons per year in NO_x emissions from 8 facilities, and these reductions will ultimately be captured through permit limits. Detailed information regarding the specific facilities and the respective reductions will be included in South Carolina's Early Action SIP submittal, December 2004.

The Department is finalizing plans for a public meeting on the Early Action SIP submittal on August 18, 2004. Publication of the Early Action SIP in the State Register is tentatively scheduled for September 2004, allowing for a public hearing in October 2004. This will allow the Department ample time to address issues and concerns and submit the SIP to EPA by December 31, 2004. The Department will notify EPA once these dates are finalized. Recent electronic correspondence has indicated that guidance is being developed to assist the states in completing the Early Action SIP submittal. The Department requests that EPA consider the time required in scheduling public meetings and issuing appropriate notifications of such. The Department would also like for EPA to provide applicable guidance for the Early Action SIP as soon as possible.

The early action process continues to be a positive experience for South Carolina and has provided an increased awareness of air quality issues. As a result, requests for education and outreach assistance and initiatives continues to increase. Thank you for the assistance and support EPA has provided in this process. We look forward to continuing to work with EPA as we implement measures to achieve cleaner air sooner for our citizens. Should you have questions or desire additional information, please do not hesitate to contact me at (803) 896-8940 or Myra Reece, Chief of the Bureau of Air Quality at (803) 898-4123.

Sincerely,



Robert W. King, Jr., P.E.
Deputy Commissioner
Environmental Quality Control

Enclosure: June 2004 Progress Reports for Participating Areas

cc: Kay Prince, EPA Region 4
County Officials (no attachments*)
Ron Methier, GA Dept. of Natural Resources (no attachments*)
Keith Overcash, NC Dept. of Environmental and Natural Resources (no attachments*)
EQC District Directors (no attachments*)

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